



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

August 1, 2024

By ECF

Hon. Stewart D. Aaron
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Burton v. United States*, Case No. 18 CV 2039 (JHR) (SDA)

Dear Judge Aaron:

This Office represents defendant the United States, sued under the Federal Tort Claims Act, and defendants Anthony Bussanich, Robert Beaudouin, Ysmael Joaquin, Kimberly Shivers, Lorenzo Barazza, Gerald Castillo, Wilson Silva, Quentin Holzendorf, Terrence Thomas, Rosalind Silvia, and Shaadiq Shakir, all current or former employees of the Bureau of Prisons ("BOP"), sued in their individual capacities under *Bivens v. Six Unknown Fed. Narcotics Agents*, 403 U.S. 388 (1971) (the "*Bivens* defendants"). The case arises from the death of Franklin Sanchez, a Colombian national extradited to the United States on criminal charges who died while in custody at the MCC. This matter is before Your Honor for all general pretrial matters.

We write respectfully to request a four-day extension of the deadline to respond to the discovery dispute letter submitted by Plaintiffs, Dkt. No. 154, from August 1 to August 5. The Government is attempting to obtain information concerning officers on duty in March 2015, which would obviate the need for a conference with the Court on this issue. Unfortunately, agency counsel was out of the office today and unable to provide necessary assistance. The undersigned apologizes to the Court for the lateness of this extension request, which was due to the press of business. Plaintiff does not consent to this request.

We thank you for your consideration of this matter.

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

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cc: Plaintiffs' Counsel (by ECF)